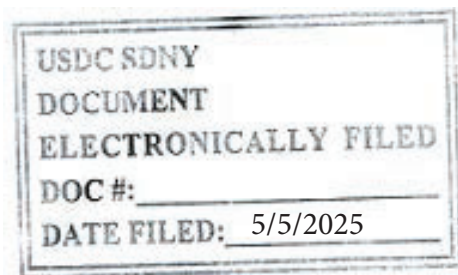


MEMO ENDORSED



April 28, 2025

The Honorable Nelson S. Roman
 United States District Judge
 Charles L. Brieant Jr. Federal Building
 and United States Courthouse
 300 Quarropas St.
 White Plains, New York 10601-4150

Re: *United States v. Jiangnan Lin* 23-Cr-612 (NSR)-03

Dear Judge Roman:

Joshua Dratel and I represent Jiangnan Lin, who is currently scheduled to be sentenced on May 22, 2025. We write to request an adjournment of sentencing, ideally to September. The government objects.

Mr. Lin suffers from Hydronephrosis, a condition where kidney swelling can result in impaired kidney function. Mr. Lin has had this condition for some time, but it has become more acute over the last year or so. In July 2024, after complaining of severe kidney and back pain, Mr. Lin had a thorough evaluation at the Westchester County Medical Center, which included kidney scans. The imaging showed a complete left renal obstruction with reduced blood flow, which left his left kidney with only 28% of total renal function.

On September 5, 2024, Mr. Lin was seen by a urologist who discussed treatment options, and recommended addressing the condition with a nephrectomy of the affected kidney, meaning Mr. Lin would have his kidney removed to prevent further episodes and complications of his obstruction. In preparation for sentencing, we asked two doctors to review Mr. Lin's medical records and they arrived at the same conclusion: a nephrectomy is the medically recommended course of action. Unfortunately, in October 2024, the U.S. Marshals Service declined to authorize the recommended surgery absent further indications. Mr. Lin was, instead, prescribed ibuprofen and other medication to address his near constant pain.

Since then, Mr. Lin has repeatedly complained about his pain to medical staff at the Westchester County Correctional Center. About three weeks ago, he was taken to the medical center for a new scan of his left kidney. The government has confirmed for us that Mr. Lin will have a follow-appointment with a urologist at the Westchester County Medical Center in the near future to discuss the results of the new scan and to recommend treatment. Assuming the urologist makes the same recommendation – that removal of the kidney is the only prudent and medically advisable option – we expect that the Marshals Service will authorize the procedure. If it does not, we will seek the Court's

intervention.

These circumstances all make it likely that Mr. Lin will require surgery in the near future – perhaps within 4-6 weeks – and will then need a recovery period. Given his already existing medical relationship with the Westchester County Medical Center (“WCMC”), it seems to us utterly reasonable to adjourn Mr. Lin’s sentencing until after the procedure and recovery. It could be medically disastrous if he were moved to BOP custody before surgery, requiring the process to start anew – under Bureau of Prisons (“BOP”) supervision instead of the Marshals Service – with an uncertain outcome, and interrupting the continuity of care that has been established at WCMC. Likewise, the interval between sentencing and designation even before BOP custody commenced would unnecessarily delay the surgery, and compel Mr. Lin to endure months more of increasing pain.

Recently, the Court granted Mr. Lin’s co-defendant Sui Zhang’s request for an adjournment of sentencing to September 2025. Counsel for Mr. Zhang asked for extra time because much of the mitigation information necessary for sentencing comes from China and therefore requires extra time to obtain and to translate. We are in a similar position with Mr. Lin. Almost all of his family is in China, and while we have received some letters, we are still awaiting records and further correspondence, all of which will have to be translated.

In light of these circumstances, and given that one of Mr. Lin’s co-defendants is now being sentenced in September, we respectfully request a similar adjournment of sentencing to September 2025. This request is not made to delay the proceedings in this case, but for the important reasons set forth in this letter.

Thank you for your consideration.

Respectfully submitted,

/s/

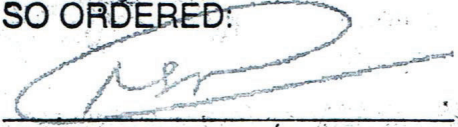
Florian Miedel
Joshua L. Dratel
Attorneys for Jiangnan Lin

CC: All counsel (*via ECF*)

Defendant Lin's (03) request to adjourn the May 22, 2025 Sentencing is GRANTED over the Government's objection. Sentencing is adjourned until September 10, 2025 at 12:00 noon. Clerk of Court is requested to terminate the motion at ECF No. 123.

**Dated: White Plains, NY
May 5, 2025**

SO ORDERED:


**HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE**